

CONTINUATION OF APPLICATION FOR A SEARCH WARRANT

SUMMARY OF AFFIDAVIT

I am applying for a warrant to search three phones and a computer linked to Maurice Demetrius THOMAS. On August 18, 2021, a grand jury indicted THOMAS with conspiracy to distribute and possess with intent to distribute controlled substances and possession of firearms in furtherance of drug trafficking. Key evidence in the case against THOMAS included Facebook Messenger conversations with his co-conspirator Joshua CARPENTER, including messages in which THOMAS discussed receiving payment for drugs via the cryptocurrency Bitcoin.

Investigators found THOMAS driving a car on the morning of September 2, 2021 and arrested him. They found an iPhone in a black and bronze colored case inside the vehicle THOMAS was arrested in. After that, a federal magistrate in the Northern District of Indiana issued a warrant for the search of THOMAS's home, and during that search, investigators found firearms, ammunition, narcotics, two cellular phones, a computer, and other items believed to be used in the furtherance of drug trafficking, wire fraud, and money laundering.

Based on the facts described above and in further detail below, I submit there is probable cause that a search of the cellular and computer devices will uncover more evidence of possession of controlled substances with intent to distribute, and associated wire fraud and money laundering schemes.

AGENT BACKGROUND

1. I am a Special Agent (SA) with Homeland Security Investigations (HSI), Department of Homeland Security (DHS), assigned to the Special Agent in Charge (SAC) Office in Detroit, Michigan, and have been so employed since March 9, 2012. I am currently assigned to the Assistant Special Agent in Charge (ASAC) Office in Grand Rapids, Michigan and primarily work out of Post of Duty (POD) Battle Creek, Michigan. I have a Bachelor of Arts degree in Political Science from Youngstown State University. I have successfully completed the Criminal Investigator Training Program at the Federal Law Enforcement Training Center in Glynco, Georgia. I have also received training in the manner and means by which individuals engage in narcotics trafficking. Prior to my employment with HSI, I was a Senior Special Agent with the Diplomatic Security Service (DSS) serving in Iraq, Pakistan, and Afghanistan. Prior to my employment with DSS, I was an ATSAC with the Federal Air Marshal Service (FAMS) in charge of the Investigations Division, Counter Terrorism Branch at Headquarters. Prior to my employment with the FAMS, I was an Agent with the United States Border Patrol serving as a Team Leader with the Special Operations Group(s) in San Diego, California. I possess over twenty-three years of federal law enforcement experience. As part of my duties, I investigate criminal violations relating to narcotics trafficking, including violations pertaining to the illegal production, distribution, receipt and possession of illegal drugs, and associated conspiracy in violation of 21 U.S.C. §§ 841 and 846. I also investigate drug-connected firearms offenses, such as possession of firearms in furtherance of drug trafficking and conspiracy to commit the same, contrary

to 18 U.S.C. §§ 924(c) and (o). I have received training and instruction in the field of investigation of narcotics trafficking and have had the opportunity to participate in investigations relating to the trafficking of illegal drugs. I also have training and experience investigating the money laundering of drug proceeds contrary to 18 U.S.C. § 1956. In the past two years, I have also witnessed a growing link between illegal drug trafficking and fraud schemes that take advantage of COVID-19 relief programs. Through these cases, I have gained experience in investigating the offense of wire fraud contrary to 18 U.S.C. § 1343.

PROBABLE CAUSE

The purpose of this affidavit is to establish probable cause for a search. It does not contain all of the information collected in this investigation.

THOMAS Uses Facebook Messenger for Drug Trafficking.

2. Maurice THOMAS used Facebook Messenger to communicate with a man named Joshua CARPENTER about buying and selling drugs. Over the course of the last three months of 2020, the two exchanged multiple text, audio, and photo messages. Below are some examples. THOMAS's Facebook username was "Thomas Maurice." CARPENTER's was "Jayy Savage." I note also that "dog" is a street term for heroin and "band" is a street term for \$1,000.

Author Jayy Savage (Facebook: 100000217967702)
Sent 2020-09-15 21:56:10 UTC
Body yo you hear back about that dog yet?

Author Jayy Savage (Facebook: 100000217967702)
Sent 2020-09-15 21:56:33 UTC
Body my ppl wanting to come down and grab it

Author Jayy Savage (Facebook: 100000217967702)
Sent 2020-09-15 21:57:01 UTC
Body Maurice missed your call.

Author Thomas Maurice (Facebook: 100001467996101)
Sent 2020-09-15 22:04:43 UTC
Body Let me call my ppl

Author Jayy Savage (Facebook: 100000217967702)
Sent 2020-09-15 22:05:51 UTC
Body OK lmk asap

Author Jayy Savage (Facebook: 100000217967702)
Sent 2020-09-15 23:05:38 UTC
Body wtw

Author Thomas Maurice (Facebook: 100001467996101)
Sent 2020-09-15 23:06:00 UTC
Body Waiting for a call back

Author Thomas Maurice (Facebook: 100001467996101)
Sent 2020-09-15 23:46:35 UTC
Body Ppl said 550 for 7

Author Jayy Savage (Facebook: 100000217967702)

Sent 2020-09-17 02:02:37 UTC

Body what you do me a whole 16 for?

Author Thomas Maurice (Facebook: 100001467996101)

Sent 2020-09-17 02:03:42 UTC

Body 85 even

Author Jayy Savage (Facebook: 100000217967702)

Sent 2020-09-17 02:04:58 UTC

Body hows that? that's more than 500 a zip

Author Thomas Maurice (Facebook: 100001467996101)

Sent 2020-09-17 02:06:27 UTC

Body Lowest is 82 all of them not 5 even gotta get at least \$550 for 4 of them

Author Jayy Savage (Facebook: 100000217967702)

Sent 2020-09-29 20:15:22 UTC

Body bro what's good

Author Thomas Maurice (Facebook: 100001467996101)

Sent 2020-09-29 20:17:09 UTC

Body Still on standby waiting on them to let me know something

Author Jayy Savage (Facebook: 100000217967702)

Sent 2020-09-29 20:30:11 UTC

Body ain't no one got anything? I got 8 bands rt now cash money and 30 ppl wanting shit

3. Sometimes, CARPENTER paid THOMAS for drugs using the cryptocurrency Bitcoin. For example, on November 10, 2020, CARPENTER sent THOMAS two audio messages in which he explained that he was about to use a card to withdraw cash to repay

THOMAS. CARPENTER offered to pay THOMAS in Bitcoin as an alternative. THOMAS responded that, of the \$8,000 CARPENTER owed him, he wanted “6 cash and 2 in btc.” (Bitcoin is sometimes abbreviated “btc.”) THOMAS then sent CARPENTER his Bitcoin address.

- a. Bitcoin is a type of cryptocurrency that uses blockchain technology.

Blockchain is an electronic ledger that keeps a record of transactions as a unit of digital currency moves from person to person.

- b. To use blockchain cryptocurrency, a user needs both a public key and a private key. A public key is like a public address – it tells people where they should route cryptocurrency if they want to pay a particular person. A private key is what allows an individual to “unlock” cryptocurrency that have been sent to their public address so that the cryptocurrency can be used to purchase other assets or commodities.

4. Below is a screenshot of the above-described exchange between THOMAS and CARPENTER:

Author Jayy Savage (Facebook: 100000217967702)
Sent 2020-11-10 16:13:40 UTC
Body Jayy sent a voice message.
Attachments audioclip-1605024819000-6316.mp4 (390184765366058)
Type audio/mpeg
Size 52541
URL https://interncache-frc.fbsbx.com/v/t59.3654-21/123382887_390184768699391_2424901224265063760_n.mp4/audioclip-1605024819000-6316.mp4?ccb=1-3&_nc_sid=7272a8&efg=eyJ1cmxnZW4iOiJwaHBfdXJsZ2VuX2NsaWVudC9lbnRpdHkvbWVzc2FnZV9hdWRpbyJ9&_nc_ht=interncache-frc.fbsbx.com&oh=6ce7db95a676f3c0af6e5b39b9daa3e7&oe=60FBE446&dl=1

Author Jayy Savage (Facebook: 100000217967702)
Sent 2020-11-10 16:13:55 UTC
Body Jayy sent a voice message.
Attachments audioclip-1605024834000-5411.mp4 (425112248885017)
Type audio/mpeg
Size 45119
URL https://interncache-frc.fbsbx.com/v/t59.3654-21/124849506_425112252218350_3994006089902166566_n.mp4/audioclip-1605024834000-5411.mp4?ccb=1-3&_nc_sid=7272a8&efg=eyJ1cmxnZW4iOiJwaHBfdXJsZ2VuX2NsaWVudC9lbnRpdHkvbWVzc2FnZV9hdWRpbyJ9&_nc_ht=interncache-frc.fbsbx.com&oh=07b5bba45dde126a9d6a6977c5a4f424&oe=60FB7FAD&dl=1

Author Thomas Maurice (Facebook: 100001467996101)
Sent 2020-11-10 16:19:16 UTC
Body 6 cash and 2 in btc

Author Jayy Savage (Facebook: 100000217967702)
Sent 2020-11-10 16:21:08 UTC
Body OK bet

Author Jayy Savage (Facebook: 100000217967702)
Sent 2020-11-10 16:21:33 UTC
Body Send me your btc addy

Author Thomas Maurice (Facebook: 100001467996101)
Sent 2020-11-10 16:30:55 UTC
Body 1Dc1jC4iuCmzePtRBUQjX5953uf1dxNMe9

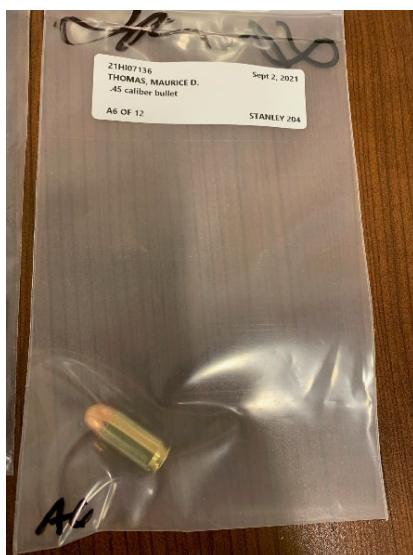
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A Grand Jury Indicts Maurice Thomas with Federal Drug Offenses.

5. On August 18, 2021, a grand jury in the Western District of Michigan returned an indictment accusing Maurice Demetrius THOMAS with two offenses: (1) conspiracy to distribute and possess with intent to distribute controlled substances, contrary to 21 U.S.C. § 846 and (2) possession of firearms in furtherance of drug trafficking, contrary to 18 U.S.C. § 924(c). A warrant issued for his arrest.

Investigators Arrest Maurice THOMAS.

6. On September 2, 2021 at approximately 7:50AM central time, Lake County Drug Task Force investigators approached Maurice THOMAS as he exited the residence located at 3620 Johnson St., Gary, IN. THOMAS was arrested pursuant to arrest warrant described above, after getting into a white in color Volvo SUV bearing Indiana license plate MZTHOM, which was registered to THOMAS's girlfriend Ronisha BYRD at 3620 Johnson Street, Gary, IN. The vehicle was impounded by the Lake County Drug Task Force in Lake County, Indiana, and during an inventory search, an iPhone in a black and bronze colored case was located. Additionally, a .45 caliber bullet, approximately 26 grams of suspected ecstasy pills (with packaging), burnt ends of suspected marijuana cigars, and a Navy Federal Credit Union Debit Card in the name of George Caudill were also identified. Here are some pictures of some of these items:



7. DEA and Lake County Drug Task Force investigators spoke with Ronisha Byrd, the mother of some of THOMAS' children, at the front door of 3620 Johnson St. Investigators told Byrd that THOMAS has been arrested pursuant to a federal indictment in the Western District of Michigan and investigators would like consent from Byrd to

search her residence. Byrd was presented a DEA Consent to Search form listing her residence as the location to be searched. Byrd gave verbal consent to investigators and agreed to allow her residence to be searched. However, Byrd would not sign the Consent to Search or allow investigators to video record Byrd giving permission to search, but restated investigators did have her consent to search her residence.

8. Relying on Byrd's consent, investigators went into 3620 Johnson Street. In the main bedroom, investigators located a box of .40 caliber pistol ammunition on a shelf in the closet. Investigators also located credit cards with Maurice THOMAS's name on them. The cards were in the pocket of a jacket hanging on the inside of the main bedroom door. In another pocket of the same jacket, investigators found a bag containing a white, crystalline substance. The officers were familiar with the appearance of crystal methamphetamine because they had participated in dozens of drug investigations and had seen what crystal methamphetamine looked like. The substance in the jacket looked like crystal methamphetamine. On the floor in the kitchen, investigators found a loaded Glock .45 caliber pistol magazine. In the basement inside a plastic tub, they found a loaded 7.62 x 39 caliber rifle magazine.

9. After investigators found these items, Byrd told investigators she needed to take her children to school, and investigators left the residence with the seized items described above. Byrd locked the door to her residence and left with her children. Byrd indicated to investigators the children's school was a short distance away and Byrd would return to allow investigators to continue their search.

Investigators Obtain a Federal Search Warrant.

10. Hours passed on September 2, 2021 after Ms. Byrd left her home. She did not return. So investigators sought and obtained a federal search warrant for Northern District of Indiana for 3620 Johnson Street, Gary, Indiana.

11. After the warrant was issued, investigators resumed their search. They found a loaded Ruger 5.7 x 28 caliber pistol and a loaded Glock 21 .45 caliber pistol with what appeared to be a fully automatic conversion kit and drum magazine which were recovered from a trash can. Additional firearms magazines, ammunition, firearms parts, suspected crystal methamphetamine, and distribution quantities of marijuana were also found throughout the house along with a black in color LG Cellular Phone, a Samsung Cellular Phone, a Lenovo laptop computer, a credit card encoding machine, a printer with a printed check on the printer, and a PayPal card reader. Here are some pictures of some of these items:







Often, Wire Fraud and Money Laundering Follow Drug Trafficking.

12. In my training and experience, printers, laptop computers, and credit card encoding machines can be important tools for drug traffickers to access and spend their drug trafficking proceeds. Drug dealing is an especially cash-heavy business, but, often, dealers cannot spend or deposit large amounts of cash without drawing significant attention and creating a so-called “paper trail” that can expose their illegal activities. For example, banks have reporting requirements for amounts in excess of \$10,000, and even storefront retailers may notice if a customer has to sort through thousands of dollars in cash at a register while making a big purchase. At the same time, the main point of drug trafficking is usually to make money so that it can be spent on things that a drug dealer

wants to purchase. Hence, drug dealers typically have a strong desire to spend their drug proceeds while also having a strong incentive to disguise their proceeds before spending them.

13. From a drug dealer's perspective, wire fraud can be a convenient way to solve this problem. Dealers can take out credit cards in the names of others and pay off charges with drug proceeds, all without drawing attention to themselves – on paper, it looks like the person whose name is on the card is the one doing the spending. Dealers can also print fake credit cards and load them with drug trafficking funds, allowing them to spend the funds inconspicuously.

14. Besides this, I am aware that, due to the widespread availability of COVID-19 relief funds through the Payroll Protection Program, many drug dealers have turned to wire fraud as a way to secure funding for bulk purchases of controlled substances, as well as firearms and ammunition that can be used to protect them.

THOMAS's Co-Conspirator was Caught with Similar Evidence.

15. One of THOMAS's charged co-conspirators is a man named Joshua CARPENTER. Members of the Battle Creek Police Department arrested CARPENTER on or about May 26, 2021, and, afterwards, he waived his *Miranda* rights and spoke to me about his criminal activities. He admitted to not only buying methamphetamine from THOMAS, but also to searching the internet for stolen personally identifiable information (PII) so that he could use it in printing fake identification cards. When police searched CARPENTER's hotel room later that same day, they also found printing equipment and a credit card encoding machine.

16. Based on my experience, it does not seem coincidental that CARPENTER and THOMAS would have similar credit card encoding equipment in their possession. CARPENTER admitted to trafficking drugs with THOMAS, and he confessed to combing the internet for stolen identity information. Given the similarities between the type of equipment that the two possessed, I infer that one taught the other how to support their drug trafficking with related credit card fraud. This inference is supported by the recovery of a credit card in another person's name within the car that THOMAS was arrested in.

Cell Phones and Computers are Crucial Tools for Drug Traffickers, including THOMAS.

17. In my training and experience, cell phones and computers are crucial tools for drug traffickers. Phones remain the most convenient way for traffickers to communicate with customers and suppliers alike. Traffickers can download applications that allow them to send encrypted communications to suppliers and customers, and though these applications are sometimes unrecoverable from the servers of the application provider, key texts and videos often remain stored on a trafficker's smartphone. In addition, I am aware that drug traffickers often take photos and videos of their product in order to demonstrate its quality to prospective buyers. These photos can provide valuable evidence concerning the types of drugs that a trafficker sells.

18. Within this case, there is evidence that THOMAS was using a cell phone or a computer to communicate with his co-conspirator, CARPTENTER. Facebook Messenger is an application that can be downloaded onto a smartphone or used from a laptop computer.

19. Though my training and experience, I also know that it is common for drug traffickers to have more than one cell phone. Often, one phone is used to communicate with customers, and another is used to communicate with suppliers.

20. Through my training and experience, I also know that laptops and smartphones are valuable tools for those who wish to find and purchase stolen PII using the internet. These are the devices that a fraudster must use to obtain the information he seeks.

Cell Phones and Computers are Crucial Tools for Possessors of Cryptocurrency.

21. Because Bitcoin is a digital asset, smartphones and computers are essential tools for obtaining, storing, and spending Bitcoin. Bitcoin users typically have a “wallet,” which is simply a tool to manage public and private keys – and thus control funds. Two of the most common types of wallets are “software” and “hosted.” “Software wallets” refer to applications that users can install on a smartphone or other digital device to store keys and transfer bitcoins. They can often be set up to require a username and password to access. Importantly, many of the companies that provide software wallets for download do not store or otherwise have access to their users’ private keys. Rather, the private keys are stored on the device where the wallet application is itself installed. A “hosted” (or “custodial”) wallet is controlled by a third party, often a company with a cloud-based, encrypted wallet platform hosted on the company’s servers (whether in the United States or abroad). Users may be able to access the provider’s platform through various digital devices, much like a traditional online banking experience. While hosted wallet users may be able to conduct transactions more easily than unhosted wallet users, they face the risk that the third-party host could lose users’ funds due to theft or human

error. Wallet-hosting service providers include cryptocurrency exchanges, which allow their customers, for a fee, to exchange cryptocurrency for fiat currency or other cryptocurrencies. A smartphone or computer is necessary in order for a cryptocurrency owner to use a hosted wallet service.

22. Because software and hosted wallets depend upon smartphones and computers, it is highly likely that a cryptocurrency owner's phone and computers will contain information concerning cryptocurrency transactions.

CONCLUSION

Based on the information above, I submit there is probable cause that a search of the cellular device found in the vehicle that THOMAS was arrested in, and the two cellular devices and Lenovo laptop computer found at 3620 Johnson St., Gary, Indiana will uncover evidence of, fruits of, and instrumentalities of the offenses of possession of controlled substances with the intent to distribute, contrary to 21 U.S.C. § 841(a), as well as evidence of wire fraud contrary to 18 U.S.C. § 1343. I submit there is also probable cause that a search of these devices will uncover evidence of where and how THOMAS has stored the cryptocurrency that he accepted as drug payment.